



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

October 11, 2021

VIA ELECTRONIC CASE FILING

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Daniel Retter v. Bolivarian Republic of Venezuela*
Case No.: 1:20-cv-08495 (JPC)

Dear Judge Cronan:

The undersigned represents the Plaintiff in the above-referenced matter. Pursuant to the Court's directives, Plaintiff respectfully submits the following to provide the Court with a status update as to Plaintiff's endeavors to effectuate service of an amended complaint.

On February 23, 2021, the Court granted Plaintiff's application to file an amended complaint and directed that service be effectuated in accordance with the Foreign Sovereign Immunities Act ("FSIA") on or before December 23, 2021. The undersigned has since communicated with counsel for the Defendant in other matters and, in addition to the undersigned's research, has concluded that service of process must be effectuated on Defendant via diplomatic channels pursuant to FSIA § 1608(a)(4). To that end, Plaintiff engaged a transcription service to translate all documents to be served on Defendant from English to Spanish. Plaintiff has recently received the translated documents and is preparing them for submission to the Clerk of Court for transmission to the United States Department of State for service on Defendant pursuant to FSIA § 1608(a)(4) and 22 C.F.R. § 93.1(c).

Respectfully submitted,

PARDALIS & NOHAVICKA, LLP

/s/ Gregory A. Nahas

Gregory A. Nahas, Esq. (GN1002)
950 Third Avenue, 27th Floor
New York, New York 10022
Tel: (212) 213-8511
greg@pnlawyers.com
Fax: (347) 897-0094
Attorneys for Plaintiff